

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Chapter 7
)	
LARRY O. HAYNES and)	Case No. 05 B 49995
LYNNETTE M. HAYNES,)	
Debtors)	Hon. Jacqueline Cox

**FINAL APPLICATION FOR
COMPENSATION OF COUNSEL FOR THE TRUSTEE**

Pursuant to 11 U.S.C. §331, HERZOG & SCHWARTZ, P.C., counsel for the Trustee, David R. Herzog, respectfully applies to this Court for final compensation for actual, necessary services rendered and reimbursement for actual, necessary out-of-pocket expenses. HERZOG & SCHWARTZ, P.C. has divided this application into two parts. The first part of the application shall review the problems confronted by the Trustee and provide general background information. The second part of the application shall provide an analysis by task of legal work performed by the HERZOG & SCHWARTZ, P.C.

PART I

BACKGROUND

The debtors, LARRY O. HAYNES and LYNNETTE M. HAYNES, filed a petition under Chapter 7 on October 12, 2005. Thereafter, DAVID R. HERZOG was appointed Trustee and accepted his appointment. On January 12, 2006, an order was entered which permitted the Trustee to employ the law firm of Herzog & Schwartz, P.C. (the "law firm"), as attorneys for the Trustee.

Each task performed by the law firm will be discussed in detail. This fee application covers services rendered by the law firm for the period of December 16, 2005 through the present. The

billable rates for members of the law firm were charged on an hourly basis. This application sets forth the hours of work performed per attorney, per task at the hourly rate that was in effect at the time the services were provided. A detailed description of each time entry is attached to this application as Exhibit A.

PART II

TASK ANALYSIS

A. Sale of Real Estate

The law firm spent 11.75 hours in connection with the sale of of real estate of the Debtors. The firm spent time working with the broker on these transactions, assuring the property was secure, as working on title issues, preparation of closing documents, and attending the closing of the transaction.

	<u>Hours</u>	<u>Costs</u>
David R. Herzog @ 250.00 per hour	11.75	\$ 2,937.50
TOTAL	11.75	\$ 2,937.50

B. Miscellaneous

The law firm spent 5.25 hours in connection with miscellaneous matters, including investigation of other possible assets, employment of professionals, as well as preparation of the final report.

	<u>Hours</u>	<u>Costs</u>
David R. Herzog @ 250.00 per hour	5.25	\$ 1,312.50
TOTAL	5.25	\$ 1,312.50

RECAPITULATION

	<u>Hours</u>	<u>Costs</u>
Category A	11.75	\$ 2,937.50
Category B	5.25	\$ 1,312.50
TOTAL	17.00	\$ 4,250.00*

*While attorneys fees in this matter are \$4,250.00, because of the limited funds in the estate, the law firm is willing to cap its fees at \$1,250.00.

WHEREFORE, the law firm respectfully requests that this Honorable Court enter an Order:

1) Granting the law firm reasonable compensation of \$1,250.00, and necessary expenses of \$0.00 for legal services rendered in this case.

2) For such further relief that this Honorable Court deems just and reasonable.

HERZOG & SCHWARTZ, P.C.

By: /s/ David R. Herzog

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EXHIBIT F-A

ATTORNEY TIME FOR CATEGORY A

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	<u>Category</u>
12/16/05	Herzog, David Telephone conference with broker re: winterization.	0.15	37.50	A
12/19/05	Herzog, David Telephone conference from broker securing premises.	0.10	25.00	A
12/20/05	Herzog, David Attend court call - motion to lift stay.	1.00	250.00	A
12/20/05	Herzog, David Telephone conference with attorney and bank representative.	0.15	37.50	A
12/20/05	Herzog, David Telephone conference with broker.	0.10	25.00	A
01/13/06	Herzog, David Meet with broker re property; execute agreements	1.00	250.00	A
01/20/06	Herzog, David Conference with broker re offer on property.	0.25	62.50	A
01/24/06	Herzog, David Review offer and meet with broker re sale.	1.00	250.00	A
01/26/06	Herzog, David Meet with broker re sale.	1.00	250.00	A
01/30/06	Herzog, David Work on real estate contract and sale	0.50	125.00	A
02/02/06	Herzog, David Review and revise real estate contract.	0.50	125.00	A
02/15/06	Herzog, David Work on motion for sale of real estate.	1.50	375.00	A

03/01/06	Herzog, David Review title commitment re payoff, etc.	0.50	125.00	A
03/07/06	Herzog, David Court call on motion to approve sale of real estate.	1.00	250.00	A
03/15/06	Herzog, David Prepare for and attend closing in Orland Park.	3.00	750.00	A

ATTORNEY TIME FOR CATEGORY B

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	<u>Category</u>
01/04/06	Herzog, David Prepare motions to employ professionals.	0.75	187.50	B
01/12/06	Herzog, David Attend court call on motion to employ broker and law firm.	1.00	250.00	B
12/28/06	Herzog, David Review claims register; begin work on final report.	1.50	375.00	B
01/21/07	Herzog, David Work on final report.	2.00	500.00	B